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November 12, 2013

**VIA E-MAIL PDF**

Hon. James C. Francis, U.S.M.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: Leena Varughese, M.D. v. Mount Sinai Medical Center, et al.**  
**Civil Action No. 12 Civ. 8812 (CM)**

Dear Judge Francis:

I represent Leena Varughese, M.D., in the above-referenced matter. I am in receipt of defendants' Motion to Quash and today's supplementation of defendants' Motion with a letter from Rory McEvoy, Esq. My e-mail to Mr. McEvoy, upon which he relies to formulate further grounds for his Motion, *is not plaintiff's opposition to the Motion* but was an effort to meet and confer with Mr. McEvoy before he filed his motion.

I am in the process of preparing formal opposition to the Motion that was filed on Friday and will address today's supplementation. I am scheduled to take the deposition of defense witness Ira Bleiweiss, M.D., tomorrow at 10 a.m. In light of this pending deposition, I intend to file opposition to the Motion and the supplement no later than this Thursday, November 14, 2013, so that the Court can address the issue expeditiously.

Hon. James C. Francis, U.S.M.J.  
November 12, 2013

We thank the Court for its consideration of this matter.

Respectfully submitted,

  
Ronald J. Wronko

cc: Rory J. McEvoy, Esq. (via ECF)